

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of  
Telecommunications and Energy on its own Motion  
into the Appropriate Pricing, based upon Total  
Element Long-Run Incremental Costs, for  
Unbundled Network Elements and Combinations of  
Unbundled Network Elements, and the Appropriate  
Avoided Cost Discount for Verizon New England,  
Inc. d/b/a Verizon Massachusetts' Resale Services  
in the Commonwealth of Massachusetts

D.T.E. 01-20

**AT&T'S TWENTY-FIRST SET OF INFORMATION  
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits to Verizon the following  
information requests. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name  
of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon  
subsequently receives or becomes aware of additional information responsive to these  
requests.

If an answer refers to Verizon's response to another information request in this proceeding,  
please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon  
cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege  
claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations

The page number references in the following questions are to the hard copy of the Panel

Testimony of Messrs Albert, Anglin, Livecchi and Ms. Matt that was distributed by Verizon on May 8, 2001.

### INFORMATION REQUESTS

- ATT-VZ 21-1. Provide Verizon – MA’s average percentage of defective copper feeder and distribution pairs at the finest level of detail maintained by Verizon – MA. Include in your answer the source of all data presented.
- ATT-VZ 21-2. Provide Verizon - MA’s average percentage of defective pairs for all copper feeder cable in the Verizon – MA service territory. If Verizon – MA claims the information is unavailable for copper feeder cable, provide an estimate of the percentage of defective pairs for all copper cable in Verizon – MA’s service territory. Include in your answer the source of all data presented.
- ATT-VZ 21-3. Provide Verizon - MA’s average percentage of defective pairs for all copper distribution cable in the Verizon – MA service territory. If Verizon – MA claims the information is unavailable for copper distribution cable, provide an estimate of the percentage of defective pairs for all copper cable in Verizon – MA’s service territory. Include in your answer the source of all data presented.
- ATT-VZ 21-4. In response to request ATT 14-4, Verizon – MA explained that on a case-by-case basis, a switch engineer or outside plant engineer, may provide for completion of construction of additional plant capacity before reaching the general administrative spare levels. Have there been any situations from January 1, 1999 to the present in which the administrative spare levels have been achieved and no additional plant capacity construction was authorized? If the answer is anything but an unqualified no, fully describe and provide details of 5 examples of such circumstances. Include in your answer the source of any data presented.
- ATT-VZ 21-5. Fully describe and provide details of the five largest (dollar amount) digital switch retirements of the \$62 million in digital switch retirements identified in response to ATT 14-9. Include in your answer the source of any data presented.
- ATT-VZ 21-6. Fully describe and provide details of the five largest (dollar amount) digital circuit retirements of the \$40 million in digital circuit retirements identified in response to ATT 14-9. Include in your answer the source of any data presented.
- ATT-VZ 21-7. Fully describe and provide details of the five largest (dollar amount) OSP Copper cable retirements of the \$36 million in OSP copper cable retirements identified in response to ATT 14-9. Include in your answer the source of any data presented.
- ATT-VZ 21-8. Describe, providing all available detail, the capital additions that correspond to the

year 2000 plant account retirements identified in response to ATT 14-9. Include in your answer the source of any data presented.

- ATT-VZ 21-9. Describe, providing all available detail, the ten largest (in terms of dollar amount) debit journal entries (along with all associated credit entries) made by Corporate Accounting to the Verizon – MA network accounts for reimbursement by a municipality or customer for reconfigurations, moves, changes or upgrades as described in Verizon – MA’s response to ATT 14-18. Include in your answer the source of any data presented.
- ATT-VZ 21-10. Describe, providing all available detail, the ten largest (in terms of dollar amount) credit journal entries (along with all associated debit entries) made by Corporate Accounting to the Verizon – MA network accounts for reimbursement by a municipality or customer for reconfigurations, moves, changes or upgrades as described in Verizon – MA’s response to ATT 14-18. Include in your answer the source of any data presented.

Respectfully submitted,  
AT&T COMMUNICATIONS OF  
NEW ENGLAND, INC.  
By its attorneys,

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